

IOWA COLLEGE STUDENT AID COMMISSION

Vatterott College Application for Postsecondary Registration Renewal May 3, 2017

STAFF ACTION: *Approve Vatterott College's Iowa registration renewal for a two-year term that begins retroactively on March 17, 2017 through March 17, 2019 with the stipulation that the College cease new enrollment at the Des Moines campus and in online programs until further notice.*

For additional information, see *Temporary Cessation of New Enrollment* below.

Registration Purpose

Revised Iowa Code Sections 261B.2 (definitions) and 261B.3 require a school to register with the Commission if a person compensated by the school conducts any portion of a course of instruction, including by in-person, distance education, or correspondence method in this state or if the school otherwise has a presence in this state. Presence means a location in Iowa at which a student participates in any structured activity related to a school's distance education course of instruction. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations. Vatterott College (the College) applied for registration renewal in order to continue to offer in-person instruction from a permanent physical location in Des Moines, Iowa, and to offer lowans distance education programs that are coordinated by the Vatterott College campus in Sunset Hills, Missouri. At least one of the College's distance education programs includes a structured field experience that an Iowan will participate in at an Iowa location.

Temporary Cessation of New Enrollment

In December 2016, the federal Department of Education (the Department) required an increased Irrevocable Letter of Credit (LOC) from the College in response to the College's failure to meet the Department's financial responsibility standards for schools that participate in the federal student aid programs. The Department requires an LOC of certain schools that fail to meet federal financial responsibility standards as a condition of the school's ability to continue providing federal student aid funding to the school's students. Since December 2016, the College and the Department have been engaged in several discussions concerning the timing of the College's fulfillment of the LOC increase. As of the date of this report, the College continues to provide federal student aid funding to eligible Iowa students and the Department appears to be working with the College. However, until discussions between the College and the Department about the Department's LOC expectations are satisfactory concluded, staff have instructed Vatterott College to cease new enrollment at the Des Moines campus and in online programs offered to Iowa residents. The College officially ceased new enrollment and posted a notice to that effect on its websites on May 2, 2017.

Institutional Information

Vatterott College is a for-profit postsecondary educational institution that provides programs via in-person instruction at 7000 Fleur Drive, Des Moines, Iowa 50321. The College coordinates distance education programs offered to lowans from the College's campus located at 12900 Maurer Industrial Drive, Sunset Hills, Missouri 63127. The College's Chief Executive

Officer is President Rene Crosswhite, 8580 Evans Avenue, Suite B, Berkeley, Missouri 63134. The College's Iowa contact person is Interim Des Moines Campus Director Deborah Lenihan, 7000 Fleur Drive, Des Moines, Iowa 50321. The College is registered with the Iowa Secretary of State as a foreign for-profit corporation #266387 under the name Vatterott Educational Centers, Inc. The Iowa resident agent is National Corporate Research, Ltd., 400 Locust St., Suite 400, Des Moines, IA 50309.

Vatterott College does not have a Board of Directors or Board of Trustees. Persons who make operational and academic decisions for Vatterott College on a national level and who have similar responsibilities for all other schools owned by Vatterott Educational Centers are:

- Ms. Rene Crosswhite – President and CEO. Ms. Crosswhite holds a Masters in Health Administration and is a Certified Public Accountant. Her professional history dates back to 1991 in areas that include financial, operational, project, and performance management in various sectors of the health services industry. She has also been in leadership roles (Vice President, Interim CEO and CFO) of health care organizations. Ms. Crosswhite initiated her tenure with Vatterott in 2013 as Chief Financial Officer and transitioned to the role of President and CEO of Vatterott in 2016.
- Dr. Marcy Ceranek - Vice President of Academics and Accreditation. Dr. Ceranek holds an Ed.D. in Higher Education Leadership and a Master's of Business Administration in Management. Dr. Ceranek's experience includes 15 years in higher education administration, including experience at both the campus and corporate levels in both accreditation and academics as well as teaching at the postsecondary level in both on-ground and online environments. Dr. Ceranek's background also includes information technology experience as a computer programmer. Dr. Ceranek was named Vice President of Academics and Accreditation in 2017.

The College is wholly owned subsidiary of Vatterott Educational Centers, Inc. Rene Crosswhite, the College President and CEO, also serves on the Board of Vatterott Educational Centers. There is no additional cross-over representation between the parent company's Board of Directors and those who have primary academic and operational leadership roles at the College. Vatterott Education Centers' separate Board consists of the following individuals.

- Mr. Dennis Ainge
- Mr. Jeffrey S. Barber
- Mr. John Danielson
- Ms. Jean Carnahan
- Rene Crosswhite

Physical Facilities: Vatterott College's Des Moines location is at 7000 Fleur Drive, a building constructed for the College and first occupied in November of 2006. The building was designed to accommodate a variety of trades, allied health, and information technology programs. The instructional facility occupies approximately 44,000 square feet on approximately 5.5 acres of land, which includes 280 parking spaces. The instructional facility houses 20 classrooms, a learning resource center (LRC) which is the campus library facility, and a student lounge. The following facilities address specific program needs:

- The Diesel Mechanic program has a large shop area that can hold up to three full size semi cabs and three welding stations with all proper safety equipment.

- The HVAC (Heating, Air Conditioning and Refrigeration Mechanic) area has multiple heating and cooling units.
- The Dental department has one functional and one expansion laboratory, one large dental clinical with four operational areas, three operational x-ray bays, a dedicated sterilization area, and a large darkroom that is shared with the Medical department.
- The Medical department has a large functional medical clinic with three private exam areas, a classroom computer lab, and a room with x-ray equipment used for positioning of patients and exposure of phantom body parts.

The College provided a copy of a current lease for the Des Moines location. While the lease was executed in 2007, it remains valid for 12 complete lease years.

Accreditation: The Des Moines campus of Vatterott College is accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC), a national accrediting agency recognized by the federal Department of Education. The program in Dental Assisting is accredited by the American Dental Association, Commission on Dental Accreditation, a specialized accrediting body recognized by the federal Department of Education. In addition, this accreditation is a qualifying condition for an educational program that prepares a student for registration in Iowa as a dental assistant. The College's Sunset Hills – Missouri location, which supports the College's online programs, is also accredited by the Accrediting Commission of Career Schools and Colleges.

Vatterott College also holds programmatic accreditation from the Accrediting Bureau of Health Education Schools (ABHES), an accrediting body that is recognized by the federal Department of Education, for a Medical Assistant Occupational Specialist diploma program that is in teach out at the Des Moines campus. ABHES has agreed to extend its accreditation through the latest graduation date of currently enrolled students, which is anticipated to be November 12, 2017. ABHES accreditation will permit this program's graduates to sit for a Certified Medical Assistant (CMA) examination offered by the American Association of Medical Assistants. Certification is not required by an agency of the State of Iowa for employment as a medical assistant, but is preferred by some employers. (Medical assistant should not be confused with physician assistant, which is an Iowa-licensed occupation.)

Federal Stafford Loan Cohort Default Rate (FFY 2013):

- Des Moines campus: 25.1%
- Berkley, Missouri (which includes the Sunset Hills, Missouri online campus): 24.7%

For comparison purposes, the FFY 2013 national average cohort default rate is 11.3%.

Graduation Rate: This is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion as reported to the federal Department of Education:

- Des Moines campus: 44%
- Sunset Hills, Missouri (online) campus: 52%

Average Loan Debt upon Graduation:

- Des Moines campus: Diploma program graduates \$10,220; Associate of Applied Science program graduates \$26,374.
- Sunset Hills, Missouri (online) campus: Diploma program graduates \$18,238; Associate of Applied Science program graduates \$26,374)

In accordance with federal student aid regulations, Vatterott College also discloses the median loan debt for graduates of programs that are eligible for federal student aid, as follows:

- Heating, Air Conditioning and Refrigeration Service Technician Diploma (Des Moines campus): federal loans - \$14,101; no private loans; institutional financing plan - \$1,798
- Medical Assistant Occupational Specialist Diploma Program (Des Moines campus): federal loans \$12,865; no private loans; no institutional financing plan
- Associate of Applied Science/Dental Assistant Specialist (Des Moines campus): fewer than 10 persons graduated from this program for the reporting period, thus data reporting is not required.
- Associate of Applied Science/Medical Assistant with Office Management (Des Moines campus): fewer than 10 persons graduated from this program for the reporting period, thus data reporting is not required.
- Associate of Applied Science/Diesel Mechanic (Des Moines campus): federal student loans \$24,084; no private loans; institutional financing plan \$1,717
- Associate of Applied Science/Pharmacy Technician (online): fewer than 10 persons graduated from this program for the reporting period, thus data reporting is not required.
- Medical Assistant Occupational Specialist Diploma Program (online): fewer than 10 persons graduated from this program for the reporting period, thus data reporting is not required.
- Associate of Applied Science/Information Systems Security Specialist (online): fewer than 10 persons graduated from this program for the reporting period, thus data reporting is not required.
- Associate of Applied Science/Computer Programming & Development (online): fewer than 10 persons graduated from this program for the reporting period, thus data reporting is not required.
- Associate of Applied Science/Paralegal (online): fewer than 10 persons graduated from this program for the reporting period, thus data reporting is not required.

Record Preservation: Vatterott College maintains student records in accordance with internal record retention guidelines, which are informed by the applicable requirements of the College's various accreditors, and state and federal regulators. These guidelines identify minimum retention periods for several categories of student records, including registration and academic progress records, admissions records, and financial aid records. When records have exceeded their retention period, they are disposed of by the campus. Permanent records (for example, transcripts) are either kept onsite or moved to an off-site, secure storage facility. Additionally, these records are kept electronically through the College's CampusVue student records system. At all times, such records are preserved in a location that affords protection against damage and loss.

Transcript Requests: Any current or former student may request a transcript by contacting:

Nick Mohr, Campus Registrar

7000 Fleur Ave.
Des Moines, IA 50321
(515) 309-9000
Nick.mohr@vatterott.edu

The College also maintains an online transcript request form at
<http://www.vatterott.edu/current.asp>

Instructional Methodology:

- *Des Moines campus:* With one exception, the programming the College offers at the Des Moines campus is delivered on-ground, primarily utilizing a combination of traditional classroom instruction (lecture) and hands-on training (lab). In addition, the Medical Assistant Occupational Specialist, Medical Assistant with Office Management and Medical Assistant with Limited Radiography programs include an externship experience, which typically takes place during the student's ultimate or penultimate term. While the Des Moines location's instruction is delivered almost entirely on-ground, the College uses an online platform to deliver support services such as electronic library resources and career services, and provides students access through the online student portal to information regarding their courses, academic progress, grades, syllabi, weekly outlines, and other support materials. The students can access this information on campus or remotely.

The Des Moines location also offers an online GED Exam Preparation Course. The goal of this online course is to prepare students for the GED test. Using the College's online platform, the course covers question formats for each discipline tested, insight into question formats for each contact area tested, sample practice test items, explanation of sample question answers, and specific tips and insights for passing each test section and content area. Vatterott College informed staff of its GED preparation program in January of 2012. Staff referred the College to the Iowa Department of Education for coordination with its GED guidelines.

- *Sunset Hills, Missouri (online) campus:* The College's Sunset Hills, Missouri location partners with Instructure, through the Canvas Learning Management System, an online interactive education platform. This system allows the College to create learning content using web based tools, develop custom learning paths for individual students or groups, facilitate student participation, communication and collaboration, and evaluate the student's work using assessment capabilities for outcomes. The various Canvas applications are intuitive, easy for students and instructors to use, and are built on a scalable enterprise technology that facilitates performance. Each student who enrolls in the online program is issued a user name and password that provides unlimited around-the-clock access.

Student Learning Resources: Hard-copy learning resources are available to students attending the College's Des Moines campus in the on-campus Learning Resource Center (LRC). The LRC contains materials and resources in sufficient quantity and scope to adequately support the level of education and training provided in the diploma and associate degree programs offered, including computers, texts, journals, electronic resources, and Internet accessible research databases. Materials range from introductory concepts to more advanced levels. Books, periodicals, journals and databases are reviewed and updated on an on-going basis to supplement text and other curricula used in the classrooms. Multi-media equipment and resources are procured on an as-needed basis to support faculty and students in each program. An onsite LRC Manager provides students with assistance navigating the in-

house resource collection; guidance to students seeking online tutoring resources; assistance to students engaged in online job searches and completion of online job applications; resume and term paper writing assistance; remedial tutoring for students seeking to improve their computer skills. The on-campus LRC's normal business hours are Monday, Wednesday, Thursday and Friday 8 am to 5 pm; Tuesday 8 am to 8 pm. An online student may seek research assistance by contacting the course instructor or Vatterott College – Sunset Hills' LRC Coordinator during normal business hours. Should online or on ground students require technical assistance with online resources they may contact Vatterott's Design Team via email Monday through Friday from 7:00 am to 7:00 pm.

The Vatterott Library Services and Student Research Center

http://www.vatterott.edu/EBSCO_host.asp is available online to all students. Resources are provided through EBSCO Host, an online research database supported by EBSCO Publishing. This service permits students to conduct research for projects, papers, and class assignments from remote locations, and offers access to textbooks, periodicals, white papers, research journals, electronic resources, and resource materials. There are approximately 286,000 full-text items available. Databases that are available through EBSCO Host include the following:

- Associates Program Source Plus contains more than 1,700 full-text journals and more than 200 full-text books. The database is designed specifically for the research needs for two-year colleges, and provides comprehensive coverage of the most relevant associates program level content.
- Computers & Applied Sciences Complete covers the research and development spectrum of the computing and applied sciences disciplines. CASC provides indexing and abstracts for more than 2,000 academic journals, professional publications, and other reference sources from a diverse collection. Full text is also available for more than 950 periodicals.
- GreenFILE offers well-researched information covering all aspects of human impact to the environment. Its collection of scholarly, government and general-interest titles includes content on global warming, green building, pollution, sustainable agriculture, renewable energy, recycling, and more. The database provides indexing and abstracts for more than 384,000 records, as well as open access full text for more than 4,700 records.
- Library, Information Science & Technology Abstracts (LISTA) indexes more than 560 core journals, nearly 50 priority journals, and nearly 125 selective journals, in addition to books and research reports. Subject coverage includes librarianship, classification, cataloging, bibliometrics, online information retrieval, and information management. Coverage in the database extends back as far as the mid-1960's.

Both the Des Moines and Sunset Hills (online) campuses offer students tutoring assistance, retention services (personal advising and counseling) and career services (e.g., updating resumes, fine-tuning interviewing skills, and professional networking techniques). The Vatterott College – Sunset Hills campus employs both retention and career services staff dedicated to assisting online students. The Ready, Set, Go! Program offers a variety of online workshops designed to prepare students to excel in school and in the workplace. (See the example that is available through the Sunset Hills campus at https://portal.vatterott-college.edu/go/sunset_hills.asp). All student services are available on ground; by telephone; via webinar or other means of communications. Resources are accessible through the online student portal to both on-campus and online students; thus, there is no difference between the availability of services to on-campus versus online student populations. Students may request assistance via phone or email during normal business hours. Student services for both on-

campus and online students are discussed in the Des Moines campus Catalog at http://www.vatterott.edu/Documents/catalogs/Des_Moines.pdf. Are links for tutoring, retention, and career services behind the student portal? Can you please share some screen shots of how these services are presented to students, and that explains the means by which students may request services (i.e., phone, email, chat or by appointment during what hours, etc.)

Curriculum Evaluation and Development: All of the College's programs are created under a standard curriculum design process. An internal curriculum committee, comprised of current faculty Subject Matter Experts (SMEs) and instructional designers, creates each program's content and structure with oversight from the College's senior academic personnel. The SMEs identify the knowledge and skill objectives for students completing each course in a program, develop common assessments for each course, select text that best fits the learning objectives of the course, create the syllabus, additional learning tools and, ultimately, pre- and post-test course examinations for the program. Instructional designers work with SMEs to prepare course modules and upload course shells into the Learning Management System, Canvas. This team also maintains the Master Course shells by communicating with the SMEs and course instructors to ensure updates to the course are made as needed.

All elements of a program are developed in consultation with a Program Advisory Committee (PAC). A PAC committee consists primarily of representatives from the employment community and practitioners. PAC members review and provide direction relating to the program's design and content, instructional materials and equipment, and the program's ability to prepare students for the modern workplace. Many PAC members are business owners that employ the College's graduates.

The College conducts observations of the courses and evaluates student surveys each term.

Student Complaints Process: Should a student have a grievance or complaint concerning any aspect of his or her recruitment, registration, attendance, education, student or career services, the student should first contact the faculty or staff member to whom the grievance or complaint refers. In addition, students with complaints or concerns may at any time contact Vatterott's Administrator of Student Affairs via email at studentaffairs@vatterott.edu.

If the student remains dissatisfied, the student may submit a grievance or complaint in writing to the Director of Education at the Des Moines campus or at the Sunset Hills, Missouri campus for students enrolled in online programs. The Director of Education will review the issue, seek resolution and notify the student of the remedy within 10 days. If the student is not satisfied with the response from the Director of Education, the student must appeal to the Campus Director in writing and within 10 days of receiving the Director of Education's decision. The Campus Director will respond to the student's appeal within 10 days. Students who wish to contest a Campus Director's resolution may submit a written appeal to the General Counsel and Chief Administrator, Vatterott Educational Centers, Inc., whose decision is final. The student may, at any time, contact the Iowa College Student Aid Commission or the Accrediting Commission of Career Schools and Colleges, the agency's accrediting agency. Vatterott College discloses its grievance policy to students in its course catalogs:

- Des Moines campus: http://www.vatterott.edu/Documents/catalogs/Des_Moines.pdf

- Sunset Hills (online) campus:
http://www.vatterott.edu/Documents/catalogs/Sunset_Hills.pdf.

Programs Offered In Iowa

The total, estimated cost of tuition, fees, books and supplies for each program is listed below.

On-Campus Programs Offered at the Vatterott College Des Moines campus

- *Certificate Programs*
 - ✓ Commercial Driver's License: \$4,250 (this program is ineligible for federal student aid)
- ✓ *Diploma Programs*
 - ✓ Medical Assistant Occupational Specialist: \$20,384
 - ✓ Heating, Air Conditioning and Refrigeration Service Technician: \$18,925
 - ✓ Powersports Equipment and Small Engine Mechanic: \$21,500
- ✓ *Associate Degree Programs*
 - ✓ Computer Programming and Development: \$39,090
 - ✓ *Dental Assistant Specialist: \$31,260
 - ✓ Diesel Mechanic: \$35,030
 - ✓ †Medical Assistant with Limited Radiography Technology: \$36,261
 - ✓ Medical Assistant with Office Management: \$36,176

*The Iowa Board of Dental Examiners licenses Dental Assistants. The Board requires that a school's Dental Assistant program be approved by the American Dental Association Commission on Dental Accreditation (CODA). Vatterott's program at the Des Moines campus is approved by CODA.

† The State of Iowa Department of Public Health licenses "Limited Radiographic Technologists." The Department of Public Health requires that a successful licensee's educational program either be approved by the Joint Review Committee on Education in Radiologic Technology (JRCERT) or by the Iowa Department of Public Health Bureau of Radiological Health. Vatterott's program is not accredited by JRCERT. The Iowa Bureau of Radiological Health confirms that while the Bureau does not officially "approve" colleges that offer this training program, the Bureau ensures that the student applying for the examination has met minimum training requirements for the examination. Graduates of Vatterott have appeared to meet these requirements.

Online Programs

- ✓ *Diploma Programs*
 - ✓ Medical Assistant Occupational Specialist: \$20,290
- ✓ *Associate Degree Programs*
 - ✓ Computer Programming and Development: \$39,890
 - ✓ Information Systems and Security Specialist: \$36,300
 - ✓ Medical Assistant with Office Management: \$34,900
 - ✓ Medical Assistant with Ophthalmic Technology: \$36,850

- ✓ Paralegal: \$31,220
- ✓ Pharmacy Technician: \$41,590. Pharmacy technicians must be registered with the Iowa Board of Pharmacy. The Board does not approve educational programs that prepare students for the pharmacy technician field. However, in addition to registration, the Board requires a person working in this capacity in an Iowa pharmacy to be nationally certified by an accredited technician certification board: the Pharmacy Technician Certification Board or the National Healthcareer Association. Vatterott's program includes two courses of instruction, for a total of 7.5 quarter credit hours, which focus on the Pharmacy Technician Certification Board examination. A third course consisting of 11 quarter credit hours includes preparation for the national certification examination and a comprehensive review of the Pharmacy Technician curriculum.
- *Continuing Education Programs* (Note: None of these programs are eligible for federal student aid.)
 - ✓ CMA/RMA Exam Preparation Course: \$75
 - ✓ Smart Phone Programming: \$510
 - ✓ Mechanic's Lien: \$150
 - ✓ GED Exam Preparation: \$150
 - ✓ Your Role in the Green Environment: \$335
 - ✓ Better Green Business: \$335
 - ✓ Electronic Evidence Discovery: \$1445

Field Experience: Some of the online and on-campus programs Vatterott College offers require a student to complete on-site field work in the state of Iowa. The following is a list of programs and a brief description of the field work the program entails.

- ✓ Medical Assistant Occupational Specialist and Medical Assistant with Office Management Online Programs: A student participates in a 240-hour externship at a medical facility under the supervision of, at minimum, a professional medical assistant. Students may engage in a variety of functions that use their administrative and clinical skills learned throughout the program as the site sees fit. The Program Director sets up interviews for the students and the sites, verifies timesheets, and serves as the liaison between the student and the externship site. Site supervisors provide feedback on student performance, which includes performance evaluations at mid-term and at the end of the term, and verification of weekly timesheets.
- ✓ Medical Assistant with Limited Radiography Technology On-Campus Program: Students in this program are expected to perform a minimum of 180 hours of externship in a clinical experience at an approved site under the supervision of a certified limited radiography technician.
- ✓ Commercial Driver's License Certificate On-Campus Program: This program consists of 160 clock hours in which students will spend a considerable amount of time behind the wheel engaged in a driving experience under the supervision of a licensed commercial driver.
- ✓ Dental Assistant Specialist On-Campus Program: Students are required to work for 32 hours per week until they have reached 320 clock hours at an assigned site. Supervision for the student is provided by a licensed dentist. A faculty member will visit each site for evaluation of the student throughout the duration of the experience.

In all cases, externship site supervisors are expected to provide students with proper supervision and guidance that aligns with learning outcomes, and provide formal feedback to College faculty via midterm and final externship evaluations.

Registration Compliance

As required by Iowa Code Section 261B.4, Vatterott College disclosed its institutional policy on refunding tuition charges for withdrawn students at the Des Moines campus and for Iowa resident students enrolled in online programs coordinated by the College's Sunset Hills campus. The College's tuition refund policy meets the requirements of Iowa Code Section 714.23 and is disclosed to students in the respective course catalog for the Des Moines and Sunset Hills locations at:

- http://www.vatterott.edu/documents/catalogs/Des_Moines.pdf
- http://www.vatterott.edu/documents/catalogs/Sunset_Hills.pdf.

Administrative rules specifically require the school to comply with the requirements of Chapter 261.9(1) "e" through "h".

- Iowa Code Section 261.9(1)(e) requires a school to maintain and disseminate a drug and alcohol abuse policy that includes sanctions for violation of the school's policy and information about the availability of drug or alcohol counseling or rehabilitation. Iowa Code Section 261.9(1)(f) requires a school to maintain and disseminate a sexual abuse policy that includes information about counseling opportunities and reporting instances of sexual abuse to school officials and law enforcement. Vatterott College complies with the requirements of Iowa Code Section 261.9(1)(e) and (f), for both the Des Moines and Sunset Hills campuses, through disclosures provided by one or more of the following:
 - ✓ The campus Annual Safety and Security Reports located at http://www.vatterott.edu/Documents/security_reports/des_moines.pdf and http://www.vatterott.edu/Documents/security_reports/sunset_hills.pdf
 - ✓ The campus Catalogs located at http://www.vatterott.edu/documents/catalogs/Des_Moines.pdf and http://www.vatterott.edu/documents/catalogs/Sunset_Hills.pdf
 - ✓ Separate Consumer Information web pages at <http://www.vatterott.edu/Documents/VEC%20Drug%20and%20Substance%20Abuse%20Policy.pdf> and http://www.vatterott.edu/Documents/Title-IX/Resources_All%20VC.pdf.
- Iowa Code Section 261.9(1)(g) requires a school to maintain a special policy for refunding tuition and mandatory fees to members of the Iowa National Guard or reserve members of the U.S. Armed Forces, or the spouse of such a member if the member has a dependent child, when the service member or spouse must withdraw from the school because the service member has been called to active (Iowa) state or federal military duty or service. Vatterott College maintains this policy for students attending its Des Moines campus and Iowa resident students attending its online programs coordinated by its Sunset Hills, Missouri campus. The policy is disclosed to students in the respective course catalogs for the Des Moines and Sunset Hills locations at:
 - ✓ http://www.vatterott.edu/documents/catalogs/Des_Moines.pdf
 - ✓ http://www.vatterott.edu/documents/catalogs/Sunset_Hills.pdf.

- Iowa Code Section 261.9(1)(h) requires an Iowa school to develop and implement a policy for employees who, in the course of their employment, attend, examine, counsel, or treat a child and who suspect the physical or sexual abuse of that child. By cross-reference from existing administrative rules for registration [283-21.2(261B), subsection 7], this policy applies to Iowa's registered schools. Vatterott College maintains a policy that complies with this requirement for personnel working in Iowa, and discloses the policy in its Annual Security Report for the Des Moines campus located at http://www.vatterott.edu/Documents/security_reports/des_moines.pdf.

Student Consumer Information: In its registration application, Vatterott College affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires disclosure to students of information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. These disclosures are duplicative of the federal Department of Education's student consumer information disclosure requirements for a school that participates in the federal student aid programs and the College discloses them in the respective course catalogs for the Des Moines, Iowa and Sunset Hills, Missouri (online) locations at http://www.vatterott.edu/documents/catalogs/Des_Moines.pdf and http://www.vatterott.edu/documents/catalogs/Sunset_Hills.pdf.

Vatterott College affirms on the application that it will comply with the provisions of Iowa Code Section 261B.7. These provisions state that provided a school does not claim "approval" or "accreditation" by the Commission or the State of Iowa, the school must disclose to students that it is registered by the Commission and provide Commission contact information for students who have questions or complaints about the school. The College currently discloses the Commission's contact information for student complaints in the respective course catalogs for the Des Moines and Sunset Hills, Missouri locations, and on its separate Consumer Information web page at <http://www.vatterott.edu/cpd.asp>.

Financial Responsibility: Vatterott College submitted copies of an audit of its parent company, Vatterott Educational Centers, Inc., conducted by independent auditing firm Ernst and Young, LLP, for the fiscal years ending December 31, 2015 and 2014. The audit report is dated May 31, 2016. The auditing firm expressed its opinion that the company's financial statements present fairly, in all material respects, its financial position.

- A for-profit institution that participates in the federal student aid programs must maintain a composite score, based on a three factor financial responsibility ratio, of at least 1.5 in order to be determined "financially responsible" without additional oversight. The most recent financial responsibility composite score verified by the federal Department of Education (the Department) for Vatterott College is for the institutional fiscal year ending December 31, 2015, when the College's composite score was -1.0. Therefore, in December 2016, the Department required the College to post an Irrevocable Letter of Credit (LOC) in the amount of \$18,238,554 as a condition of the College's ability to continue providing federal student aid funding to its students. As of the date of this report, the College and the Department are in discussions about the timing of the College's fulfillment of the Department's LOC expectation. Also see the section above captioned "Temporary Cessation of New Enrollment" for more information about staff action in response to this matter.

- A for-profit institution is prohibited from deriving more than 90% of its revenue from Title IV aid. The most recent 90/10 ratios verified by the federal Department of Education are as follows for the institutional fiscal year ending December 31, 2014:
 - ✓ Des Moines campus: 87.89%
 - ✓ Sunset Hills (Berkeley) campus, which supports the online programs: 84.84%.

Full-Time Iowa Resident Faculty Member or Program Coordinator: Vatterott College discloses a total of 13 faculty members at its Des Moines campus. Six of the faculty members, including the Campus Director, are full-time employees while the remaining 7 are part-time. The College also employs a total of five, full-time operational staff at the Des Moines, campus.

Instructional/Supervisory Staff Qualifications: The College Catalog http://www.vatterott.edu/Documents/catalogs/Des_Moines.pdf provides a curriculum vitae summary for 15 faculty members who teach at the Des Moines campus in programs that the College currently offers.

For the purpose of evaluating campus-based and online faculty, staff notes that the highest degree Vatterott College offers is an Associate Degree and that several of the programs the College offers are skill-based, undergraduate certificate or diploma programs.

The campus-based faculty review revealed the following:

- Three of the instructors hold a masters degree; the fourth has a Juris Doctorate. Of these instructors, areas of expertise include law, industrial psychology, organizational management, education, science, communications, English, mathematics, medical laboratory technology, pharmacology, and public health.
- Four of the instructors hold baccalaureate level degrees. Of these instructors, areas of expertise include education, business administration, medical assisting, medical imaging, healthcare management, mechanical engineering, and criminal justice.
- Seven of the instructors hold associate level degrees. Of those instructors, areas of expertise include telecommunications, computer systems and network technology, applied science, dental assisting, medical assisting, firefighting and rescue, automotive, and heating and cooling.
- One of the instructors in the diesel mechanic program has a high school diploma but no postsecondary degree. However, this instructor has over 10 years of experience as a diesel technician.

The College provided the credentials for 30 faculty members at the Sunset Hills, Missouri campus that provide instruction in the College's online programs, as follows:

- Two of the instructors hold a postsecondary diploma. Expertise among these two faculty members includes surgical technology and medical assisting. These faculty members teach medical terminology, clinical medical assisting, pharmacology, medical terminology, and medical billing and coding.

- Two of these instructors hold an associate degree. Expertise among these two instructors includes nursing, medical assisting, and experience teaching at the postsecondary level in the field of medical assisting. These instructors teach laboratory procedures, clinical medical assisting, pharmacology, or supervise the medical assisting externship.
- Six of the faculty members hold baccalaureate level degrees. Expertise among these faculty members includes areas such as web systems security, software, commercial technology, health information management, business administration, information system auditing, pharmacy technician employment and teaching experience at the postsecondary level.
- Sixteen of these instructors hold a masters degree. Expertise among these faculty members includes fields such as information technology and security, business administration, project management, healthcare administration, biomedical sciences, educational administration, geology, applied behavior analysis, writing, human resources administration, economics, legal analysis and paralegal studies, training and development, and nonprofit administration.
- Four instructors hold a doctoral degree. Expertise among these faculty members includes areas such as law, business management, English, and psychology.

Commitment to Iowa Students and Teach-Out: By executing her signature on the application, Vatterott College President Rene Crosswhite committed to the delivery of programs in Iowa, and agreed to provide alternatives for students to complete those programs at other institutions if Vatterott ceases the delivery of the program before students have completed their courses of study.

Student Complaints: None.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Vatterott College complies with Iowa's financial responsibility requirements, which includes documentation of a continuous corporate surety bond payable to the State of Iowa in the amount of \$50,000 issued by Travelers Casualty and Surety Company of America.

Section 714.23 – State Tuition Refund Policy

Vatterott College's tuition refund policy for students who withdraw from its Des Moines campus and Iowa residents who withdraw from its online programs complies with the provisions of Iowa Code Section 714.23.

Compliance with Iowa Code Chapter 261F

Vatterott College maintains an Educational Code of Conduct that is compliant with Iowa Code Chapter 261F and publishes the Code of Conduct on its website at http://www.vatterott.edu/Documents/FA_docs/FA_Code_of_Conduct.pdf.

The College does not maintain a preferred lender list for private education loans and provides no information about private or alternative loans on its website. Financial aid staff members are instructed to provide students with the option of in-school and out-of-school payments with no interest or fees to cover any remaining direct cost of education that is not paid by financial aid sources.